James Reynolds, Esq.
Law Office of James Reynolds
12760 High Bluff Drive, Suite 300
San Diego, California 92130
Tel: 858.792.2900
Fax: 858.792.2902
jjr@jreynoldslaw.com

Attorneys for Defendant William P. Shannahan

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

BROOKMEAD PARTNERS LP, a Nevada Limited Partnership, Plaintiff, v. Interinsurance Exchange of the Automobile Club, a California business entity, Saracia L.P. Shannahan, and William P. Shannahan, Higgs Fletcher & Mack, LLP, a California Business entity, Defendants.	CASE NO. 08 CV—659-JLS (WMC) OPPOSITION TO EX PARTE APPLICATION OF SARACIA L.P. SHANNAHAN

Defendant William P. Shannahan ("WPS") offers the following opposition to the Ex Parte Application of Saracia L.P. Shannahan.

I.

THE PLEADINGS OF BROOKMEAD PARTNERS AND HIGGS FLETCHER & MACK ARE PROPER AND SHOULD BE ALLOWED TO PROCEED

The attached Declaration of WPS presents this Court with the basis for this Defendant's belief that justice concerning the insurance proceeds at issue, can only be fairly adjudicated in this Federal Court. WPS is named solely as a defendant in the instant matter because of his possible interest in the outcome of this action; therefore these Opposition Papers do not contain legal argument on the issues of jurisdiction or interpleader, that task is left to the Plaintiff and the interpleading defendant.

WPS urges this Court to allow the matter of the Interinsurance Exchange insurance proceeds to remain in this Court, and out of reach of the State Court, which has created an appearance of impropriety in adjudicating the domestic law rights of WPS.

II.
CONCLUSION

Allowing the Complaint of Brookmead Partners to continue in this Court will create no prejudice to the complaining party, Saracia L.P. Shannahan, but will allow a fair and neutral hearing for all parties on the insurance issues contained in the Amended Complaint.

DATED: July 8, 2008 LAW OFFICES OF JAMES REYNOLDS

By: \s\ *James J. Reynolds*
JAMES J. REYNOLDS
Attorney for William P. Shannahan